

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(ALEXANDRIA DIVISION)**

In re:)	Chapter 11
)	
GLOBAL ENVIRONMENTAL)	
SOLUTIONS, INC.,)	Case No. 19-11583-BFK
)	
Debtor.)	
)	

FIRST INSURANCE FUNDING,)	
A DIVISION OF LAKE FOREST BANK)	
& TRUST COMPANY, N.A.,)	

Movant,)	
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vs.)	
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GLOBAL ENVIRONMENTAL)	
SOLUTIONS, INC.,)	

Debtor/Respondent.)	
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**AMENDED NOTICE OF FIRST INSURANCE FUNDING’S MOTION FOR RELIEF
FROM THE AUTOMATIC STAY AS TO PREMIUM FINANCE AGREEMENT**

FIRST Insurance Funding, a Division of Lake Forest Bank & Trust Company, N.A. (“FIRST”), by its undersigned counsel, has filed papers with the Court requesting that the Court grant FIRST relief from the automatic stay to permit FIRST to cancel certain financed insurance policies, recover its collateral from the respective carriers, and apply such recoveries to the amounts owed to FIRST.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant FIRST relief from the automatic stay to permit FIRST to cancel the financed insurance policies and recovery and apply its collateral, or if you want the Court to consider your views on FIRST’s motion, then you or your attorney must:

File with the Court, **on or before June 17, 2019 at 5:00 p.m.** (as set forth in the Court’s Order Granting Motion for Expedited Hearing entered June 4, 2019) at the address shown below, a written response and supporting memorandum pursuant to Local Bankruptcy Rule 9013-1(H). **Unless a written response and supporting**

memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing. If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above. You must also send a copy to the persons listed below:

Clerk of Court
United States Bankruptcy Court
200 S. Washington Street
Alexandria, Virginia 22314-5405

Attend a hearing on the motion scheduled to be held on **June 19, 2019, at 9:30 a.m.** (as set forth in the Court's Order Granting Motion for Expedited Hearing entered June 4, 2019) in Courtroom I at the United States Bankruptcy Court for the Eastern District of Virginia, Alexandria Division, 200 S. Washington Street, Alexandria, Virginia 22314,. **If no timely response has been filed opposing the relief requested, the Court may grant the relief without holding a hearing.**

A copy of any written response must be sent to:

Scott W. Foley, Esquire
SHAPIRO SHER GUINOT & SANDLER
250 W. Pratt Street, Suite 2000
Baltimore, Maryland 21201

Jack Frankel, Esquire
Office of the U.S. Trustee
1725 Duke Street, Suite 650
Alexandria, VA 22314

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Dated: June 4, 2019

Respectfully submitted,

/s/ Scott W. Foley

Scott W. Foley (VSB No. 43484)
SHAPIRO SHER GUINOT & SANDLER
250 W. Pratt Street, Suite 2000
Baltimore, Maryland 21201
Telephone: (410) 385-4234
Facsimile: (410) 539-7611
Email: swf@shapirosher.com

Counsel for FIRST Insurance Funding

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4rd day of June, 2019, a copy of the foregoing was served on the parties listed below by first-class mail, unless said party is a registered CM/ECF participant and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party.

Kevin Pomerleau, President
Global Environmental Solutions, Inc.
1420 King Street, Suite 401
Alexandria, VA 22314

Daniel M. Press, Esquire
Chung & Press, P.C.
6718 Whittier Ave., Suite 200
McLean, VA 22101
Debtor's Counsel

Jack Frankel, Esquire
Office of the U.S. Trustee
1725 Duke Street, Suite 650
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901 E. Byrd Street, Suite 1900
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Counsel for KeyBank National Association

Jacob A. Manheimer, Esquire
PIERCE ATWOOD LLP
254 Commercial Street
Portland, Maine 04101
Counsel for KeyBank National Association

20 Largest Unsecured Creditors (served via first class mail)

Altec Capital Services Inc.
33 Inverness Center Pkwy
Suite 200
Birmingham, AL 35242

American Express
P.O. Box 981537
El Paso, TX 79998

Caterpillar Financial Acct
P.O. Box 905229
Charlotte, NC 28290-5229

CERTIFIED Safety Products NY
807 State Rte 417
P.O. Box E
Andover, NY 14806

CTOS Rentals
P O Box 775543
Chicago, IL 60677-5443

Enterprise FM Exchange
9315 Olive Blvd
Saint Louis, MO 63132

Garnet Captive
604 E Baltimore Pike
Media, PA 19063

H&E Equipment Services
P. O, Box 849850
Dallas, TX 75284

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101

James River Equipment
245 Yardmaster Court
Stephenson, VA 22656

Key Bank
85 Commercial Street
Portland, ME 04101

Key Equipment Finance
PO Box 74713
Cleveland, OH 44194

NEEW Benefit Fund
N.E.E.W. Benefits Fund
PO Box 5817
Wallingford, CT 06492

NEEW Money Purchase Plan Trust
N.E.E.W. Benefits Fund
PO Box 5817
Wallingford, CT 06492

PowerPlan
21310 Network Place
Chicago, IL 60673

Progress Rail Services Corp
1600 Progress Drive
Albertville, AL 35950

United Insurance
470 Forest Ave
Portland, ME 04101

United Rentals
P.O. Box 100711
Atlanta, GA 30384

US Applicators, LLC
P.O. Box 563
Louisville, MS 39339

WEX
Wright Express
P.O. Box 6293
Carol Stream, IL 60197

/s/ Scott W. Foley

Scott W. Foley (VSB No. 43484)